

ADDENDUM

Washington State Health Benefit Exchange: Potential Role and Responsibilities of Navigators

The Washington State Health Care Authority received 12 public comments in response to the brief entitled, “Washington State Health Benefit Exchange: Potential Role and Responsibilities of Navigators,” which describes (1) the ideal qualities or traits for Navigators and (2) the types of entities best suited to act as Navigators. We are pleased to see the high level of support expressed for the recommendations outlined in the brief and appreciate the feedback and additional suggestions offered.

Comments primarily fell into four areas and will be taken into consideration as we move forward with the development of the Navigator Program. The Exchange is working with Wakely Consulting Group to further develop and refine the structure of the Navigator Program and a forthcoming report will address the program infrastructure, payment model, training program and performance measures.

Please note that the Department of Health and Human Services issued the final Exchange rule that outlines the proposed framework for the Exchange on March 12, 2012. Additional guidance on the Navigator Program includes:

- The Exchange must set standards, to include training and conflict of interest standards, for Navigators.
- Navigators must meet any licensing or certification established by the state.
- At least one Navigator must be a community and consumer focused nonprofit group. Their duties must include facilitating the selection of Qualified Health Plans (QHPs). They cannot, however, receive any consideration, e.g., commissions, from health insurance issuers in connection with enrollment in QHPs.
- States and Exchanges are prohibited from requiring that Navigators hold an agent’s or broker’s license.

Public Comment

Comments were received from the following individuals and organizations:

- Asian Counseling and Referral Service
- Group Health Cooperative
- Health Coalition for Children and Youth
- Jessica Kendall, MPH
- Northwest Health Law Advocates
- Office of the Insurance Commissioner
- Public Health- Seattle & King County
- United Healthcare
- Washington State Nurses Association
- Washington State Parent to Parent (P2P)/Arc of Washington

- Whatcom Alliance for Healthcare Access
- WithinReach

1. **Navigators should include a diverse array of organizations that are able to serve multiple populations.** Navigators will be required to serve populations from diverse ethnic, racial, cultural, linguistic and economic backgrounds and leveraging existing relationships will be critical to success. In addition to the types of entities named in the brief, organizations, such as health care providers, local government entities, immigrant and refugee organizations, and faith-based organizations may also be well-suited to serve as Navigators. These organizations may have demonstrated existing relationships or ability to establish relationships with consumers.
2. **Clear training standards must be developed to ensure consistency and quality in the Navigator Program.** A minimum standard of training and accountability will be required of Navigators, which may include licensure or certification, and will be outlined at the start of the Navigator Program. In addition to training around coverage options, costs and enrollment, specific topic areas will be covered, potentially including product-specific information (Medicaid/CHIP), small business options, working with disadvantaged populations etc. Proven training programs from the public and private sector will help inform the best practices for Navigator training.
3. **The Exchange infrastructure should be flexible and easy-to-use for Navigators and consumers.** The entry point to the Exchange will offer “consumer-friendly” features that allow for easier plan comparison and enrollment, as well as access to financial assistance information, helping to ensure a smooth user experience for consumers. A variety of stakeholders and end users for the Exchange will be consulted in the development of the Exchange interface.
4. **Funding for the Navigator Program should be uniform and cost-efficient.** Navigators will be compensated for consumer assistance activities and the Exchange will consider how to most efficiently and cost effectively provide these services, including developing sustainable financing mechanisms, leveraging federal funding and grants, and creating a centralized framework for administration.